

ZMO LAW PLLC

June 8, 2021

Via ECF

Hon. Ann M Donnelly
Eastern District of New York
US Courthouse, EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

RE: *Felipe Rodriguez v. City of New York et al.*, 21-cv-01649

Dear Judge Donnelly:

This office represents Felipe Rodriguez in the above-captioned matter. We write with respect to our forthcoming responses to two letters filed by the defendants' attorneys requesting pre-motion conferences.

On June 4, 2021, the City of New York, Sgt. George Zaroogian (Ret.), Det. John Beisel (Ret.), Det. John Califano (Ret.), Det. Jerry Fennel (Ret.) and John Wilde (Ret.) (collectively, the "City Defendants") filed a letter requesting a pre-motion conference regarding an anticipated motion to dismiss the claims against them. See ECF No. 21. On June 7, 2021, Defendants Metropolitan Transit Authority, Long Island Railroad, Det. Sullivan (Ret.), and Det. Wendel (Ret.) (collectively, the "MTA Defendants") filed a separate letter requesting a pre-motion conference regarding an anticipated motion to dismiss the claims against them. ECF No. 22.

We request that the Court set a deadline of June 18, 2021, for each of Plaintiff's two responses to these letter motions regarding the anticipated motions to dismiss; per the Court's individual rules, the letters are currently due June 11 and June 14, respectively. This extension is necessary to adequately respond to the many issues raised by both sets of defendants. I have spoken to counsel for all defendants, and they advise that they do not object to this request.

Additionally, we request that the Court enlarge the page limit from three to five pages for Plaintiff's letter responding to the City Defendants' letter. On June 1, 2021, the Court approved an identical request by the City Defendants. We have communicated with counsel for the City Defendants, and they advise that they do not object to this request.

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Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

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CC: Steven Silverberg, Esq. (via ECF and email)
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